

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

**IN THE MATTER OF:**

Prairie View Landfill  
29755 S. Prairie View Dr.  
Wilmington, IL 60481

**ATTENTION:**

Ian Johnson  
Senior Environmental Engineer  
ijohnson@wm.com

**Request to Provide Information Pursuant to the Clean Air Act**

The U.S. Environmental Protection Agency is requiring Prairie View Landfill (Prairie View or you) to submit certain information about the facility at 29755 S. Prairie View Dr. Wilmington, Illinois (the Facility). Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specifies the information that you must submit. You must send this information to us within 45 calendar days after you receive this request.

We are issuing this information request under Section 114(a) of the Clean Air Act (the CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, Region 5.

Prairie View owns and operates an emission source at the Wilmington, Illinois facility. We are requesting this information to determine whether your emission source is complying with the Clean Air Act and associated air permits and regulations, including the Standards of Performance for Municipal Solid Waste Landfills at 40 C.F.R. Part 60, Subpart WWW; the Federal Plan Requirements for Municipal Solid Waste Landfills at 40 C.F.R. Part 62, Subpart

OOO; the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Municipal Solid Waste Landfills at 40 C.F.R. Part 63, Subpart AAAA; the NESHAP for Stationary Reciprocating Internal Combustion Engines at 40 C.F.R. Part 63, Subpart ZZZZ; and any other applicable federally enforceable regulations and permits.

At this time, EPA Region 5 is not accepting any hard-copy document deliveries. If possible, we ask Prairie View to upload all required information to the secured web-link shared with you at the time you received this request. If you did not receive a web-link, or if you are having technical difficulties, you must contact Karina Kuc at [kuc.karina@epa.gov](mailto:kuc.karina@epa.gov) or 312-353-5090 to make arrangements to submit your response.

Prairie View must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1519.

You may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice.

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 et seq., because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Prairie View to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any questions about this information request to Karina Kuc at 312-353-5090.

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Michael D. Harris  
Division Director  
Enforcement and Compliance Assurance  
Division

## **Appendix A**

When providing the information requested in Appendix B, use the following instructions and definitions.

### **Instructions**

1. Provide a separate narrative response to each question and subpart of a question set forth in Appendix B.
2. Precede each answer with the number of the question to which it corresponds and, at the end of each answer, identify the person(s) who provided information used or considered in responding to that question, as well as each person consulted in the preparation of that response.
3. Indicate on each document produced, or in some other reasonable manner, the number of the question to which it corresponds.
4. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
5. Where information or documents necessary for a response are neither in your possession nor available to you, indicate in your response why the information or documents are not available or in your possession, and identify any source that either possesses or is likely to possess the documents or information.
6. If information not known or not available to you as of the date of submission later becomes known or available to you, you must supplement your response. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or incorrect, you must notify EPA as soon as possible.

### **Electronic Submissions**

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for “image over text” to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.

3. Provide submission to the secure web-link provided by EPA.
4. Provide a table of contents of all electronic documents submitted in response to our request so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number.
5. Please submit documents claimed as confidential business information (CBI) in separate file folders apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

### **Definitions**

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*, or 40 C.F.R. Part 60, Subpart WWW; 40 Part C.F.R. Part 60, Subpart XXX; 40 Part C.F.R. Part 62, Subpart OOO; and 40 C.F.R. Part 63, Subpart AAAA, as applicable.

1. The term “gas collection system” shall mean an active or passive system of wells or similar collection components used to capture and move gas at the landfill.
2. The term “gas control system” shall mean a system of active or passive components that receive and destroy landfill gases collected by the gas collection system.
3. The term “gas collection and control system” shall mean an active or passive system of wells or similar collection components to move gas at the landfill.
4. The term “LandGem” shall mean EPA’s Landfill Gas Emissions Model, which is an automated estimation tool with a Microsoft Excel interface that can be used to estimate emissions for total landfill gas, methane, carbon dioxide, nonmethane organic compounds, and individual air pollutants from municipal solid waste landfills.
5. The term “leachate” shall mean liquids, including landfill gas condensate, that has percolated through the landfill and leached out contaminants.
6. The term “surface emission monitoring” or “SEM” shall mean monitoring surface concentrations of methane at collection areas of a landfill, as required by 40 C.F.R. §§ 60.755(c), 62.16720(c), and 63.1960(c).

## **Appendix B**

### **Information You Are Required to Submit to EPA**

Prairie View must submit the following information pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a):

1. Provide current topographic site map(s) displaying the following information:
  - a. Cell and phase identifiers, including the years that each cell and phase started accepting waste;
  - b. Gas well locations and identifiers, including gas lines and gas header lines;
  - c. Leachate collector locations and identifiers;
  - d. Active filling portions under daily cover, active portions under intermediate cover, closed uncapped portions at final grade, and closed portions under final cover;
  - e. Segregated areas for special types of waste and non-degradable waste;
  - f. Areas excluded from surface emission monitoring (SEM) or exempt from quarterly SEM, include explanation(s) for the exclusion or exemption; and
  - g. Areas excluded from gas collection, include explanation(s) for the exclusion.
2. Provide the following information for the gas collection system:
  - a. List of all present and historical gas wells and leachate collectors, which are connected to the gas collection and control system (GCCS);
  - b. Date of installation of all the present and historical gas wells and leachate collectors. Indicate whether the collectors are redrills, decommissioned, abandoned, shut down, or closed, including the date on which the collectors were redrilled, decommissioned, abandoned, shut down, or closed. For redrills, provide justification for the redrill.
  - c. Indicate whether a gas well is a vertical or horizontal well;
  - d. Indicate which cell and phase each gas well is located in;
  - e. Indicate whether each present gas well has a pump for leachate/water removal;
  - f. Indicate any higher operating value or alternative operating procedure for gas wells;
  - g. Design of the main gas header, including diameter size, maximum velocity capacity, maximum rated flow rate capacity, maximum operating flow rate capacity, and maximum allowable pressure drop;
  - h. Construction records from January 2017 to the present.
3. Provide the following information for the gas control system (gas-to-energy engines, flares, renewable natural gas plant):
  - a. Design of the control system(s) and back-up control(s), including age, expected life, maximum exit velocity permitted or recommended by the manufacturer, the rated maximum capacity, rated maximum flow rate capacity, and maximum operating capacity;
  - b. Description of any treatment system(s), including a process diagram, age, expected life, maximum exit velocity permitted or recommended by the manufacturer, operating parameters and limits, rated maximum operating capacity, and maximum operating capacity;

- c. Temperature and flow rate setpoints for normal and emergency operations of the control(s);
  - d. Age and design of the blower(s) and if applicable, backup blower(s), including rated maximum flow rate at inlet vacuum and discharge pressure;
  - e. User manuals/manufacture's recommendations; and
  - f. An explanation of how the transition from gas-to-energy engines to renewable natural gas plant will be managed including how emissions will be controlled in the interim.
4. Provide all reports and calculations related to the following (Waste Management may omit documents that were previously provided to EPA in association with the March 12, 2021 virtual inspection):
- a. All active permit(s) and permit application(s);
  - b. The original construction permit(s) and permit application(s);
  - c. All applicability determination requests to and responses from the State or EPA;
  - d. All variance determination requests to and responses from the State or EPA;
  - e. Alternative compliance timeline requests to and responses from the State or EPA;
  - f. Alternatives to the emission standards, operational standards, test methods, procedures, compliance measures, monitoring, recordkeeping, or reporting provisions under 40 C.F.R. Part 60, Subpart WWW; 40 Part C.F.R. Part 60, Subpart XXX; 40 Part C.F.R. Part 62, Subpart OOO; and 40 C.F.R. Part 63, Subpart AAAA requested from IEPA and approved by IEPA.
  - g. Most recent non-methane organic compounds (NMOC) emission rate report and other calculations, including reports for all Tier 2, 3, or 4 tests;
  - h. Two most recent GCCS Design Plans. Include relevant amendments and supporting documentation for approvals of alternatives;
  - i. The initial performance test reports and stack test reports for the GCCS, and all additional performance or stack test reports from January 2012 to the present;
  - j. Monthly and annual emissions calculations for the controls from January 2017 to the present, with supporting calculations; and
  - k. Most recent LandGEM calculation. If LandGEM is not used, provide the most recent maximum expected gas flow rate calculations. Include the annual or monthly waste breakdown for every year used in the maximum expected gas flow rate calculations, from the initial start year to the present. Include scale house data of waste excluded from LandGEM calculations.
5. Identify on what dates the Landfill became or were subject to or opted-in to 40 C.F.R. Part 60, Subpart WWW; 40 Part C.F.R. Part 60, Subpart XXX; 40 Part C.F.R. Part 62, Subpart OOO; and 40 C.F.R. Part 63, Subpart AAAA, in part or in whole. State whether or not the Landfill opted-in.
6. In electronic spreadsheet format, provide the monthly quantity (tons) of waste accepted at the Landfill from January 2017 to the present, if not already provided. Include a breakdown by type of waste (i.e. municipal solid waste, construction and demolition, asbestos, sludge, etc.) and specify any segregated Landfill location(s) or cell(s) in which each type of waste was placed. List the types of waste that are classified as "nondegradable waste" and "special waste".

7. Provide the most recent studies, calculations, or reports related to gas extraction device density and the amount of vacuum applied at each gas extraction device in calculating the radius of influence, if not already provided.
8. Provide monthly cover integrity reports, including corrective actions and correction dates since from January 2017 to the present (Waste Management may omit what was already provided to EPA on 3/8/2021). Please indicate any alternative cover used.
9. Provide all gas measurements at the gas migration probes located at the boundary of the Landfill from January 2017 to the present. Include any corrective actions taken in response to landfill gas (LFG) readings in the probes.
10. In electronic spreadsheet format, provide all applicable GCCS monitoring records related to the following from January 2017 to the present. For each, include date(s) and description(s) of all monitoring activity and corrective actions taken as a result of monitoring. Please make sure units of measurement are clearly indicated.
  - a. Monthly GCCS wellhead measurements. Include methane, hydrogen, CO, and flow rate, if available. Include any written notes taken by the technician during monitoring, corrective actions and re-monitoring measurements;
  - b. Any measurements of available vacuum and oxygen measurements collected at the lateral headers, landfill gas transmission piping, and isolated segments of the GCCS;
  - c. SEM data, including but not limited to methane exceedances, follow-up monitoring from exceedances, and corrective actions performed. Include maps of the monitoring route traveled and any deviations from the 30-meter intervals;
  - d. Control device's blower(s) monitoring data, including vacuum;
  - e. Control device monitoring data, including but not limited to temperature or heat sensing data and gas flow rate (provide total gas flow rate and individual flow rates if more than one control device or a bypass is present);
  - f. All filtration or treatment operating parameters monitoring data;
  - g. Provide the LFG consumption by the flare on a daily and monthly basis;
  - h. Log of adjustment of the flares operating parameters;
  - i. Log of identification of any period when the flare was to be in service but was out of-service with a detailed explanation of the cause and actions taken to prevent or reduce the likelihood of similar occurrences in the future;
  - j. Inspection/maintenance log including the date of inspection and observed flare condition and date and description of maintenance performed; and
  - k. The maximum level(s) of sulfur in LFG combusted in the flare with supporting documentation and analysis in accordance with 35 IAC 214.301.
11. Provide all semi-annual and annual reports from January 2017 to the present (Waste Management may omit what was already provided to EPA on 3/8/2021).
12. Provide all deviations related to the following from January 2017 to the present:
  - a. Fires and subsurface oxidation events, and corrective actions;
  - b. Gas well parameter exceedances and corrective actions;



- c. Gas probe exceedances and corrective actions;
  - d. Gas wells not monitored during monthly monitoring, and explanation for exclusion;
  - e. Areas not monitored in each quarterly SEM, and explanation for exclusion;
  - f. Control, filtration, treatment system, and collection system downtime. Include corrective actions; and
  - g. Gas migration events and corrective actions.
13. From January 2017 to the present, provide all gas sampling reports, including but not limited to, sampling done for sulfur content and Hazardous Air Pollutant (HAP) content.
14. From January 2017 to the present, provide copies of all visible emission readings related to gas emissions at the Landfill.
15. Provide all leachate, condensate, and if any, recirculation documents related to the following:
- a. Description of leachate, condensate, and recirculation management, including on-site storage capacity (gallons) of any leachate and condensate;
  - b. Monthly quantity (gallons) of liquids added (other than leachate and condensate), leachate and condensate transported, collected, and recirculated, or whichever is relevant, from January 2017 to the present. Include when each cell and phase started recirculation, or liquid addition; and
  - c. The available depth-to-bottom and depth-to-water measurements for gas wells, length of perforated pipe, and percentage of perforation records from January 2017 to the present. Include corrective actions taken as a result of measurements.
16. In electronic spreadsheet format, provide copies of any citizen complaint logs collected from January 2017 to the present. The log should include:
- a. Date and time;
  - b. Location;
  - c. Description of complaint; and
  - d. Any corrective action or monitoring done as a result.